

Exhibit A

Joint¹ List of Names and Places Likely to Be Referenced at Trial

Seated at the Government's Table:

1. Assistant U.S. Attorneys Craig Heeren, Meredith Arfa and Irisa Chen
2. Trial Attorney Christine Bonomo, Department of Justice National Security Division
3. Paralegal Specialist Mary Clare McMahon
4. Special Agent Christopher Bruno, Federal Bureau of Investigation ("FBI")

Seated at the Defense Table:

5. Michael McMahon, Defendant
6. Lawrence Lustberg, Esq.
7. Genna Conti, Esq.
8. Zheng Congying, Defendant
9. Renee Wong, Esq.
10. Paul Goldberger, Esq.
11. Zhu Yong, also known as Jason Zhu, Defendant
12. Kevin Tung, Esq.

Names That May Be Mentioned During Trial:

13. Assistant United States Attorney Ellen Sise
14. Assistant United States Attorney Matthew Haggans
15. Intelligence Analyst Mary Hamilton, FBI
16. Forensic Examiner Charity Davis, FBI
17. Forensic Examiner Christian Schorle, FBI
18. Forensic Examiner Gregg Mokrzccki, FBI

¹ Defendants McMahon and Zheng do not object to this list of names and places likely to be referenced. Defendant Zhu was provided a copy of the proposed list, but did not provide his position on the list.

19. Forensic Examiner Melinda Brooks, FBI
20. Forensic Examiner Taynia Chin, FBI
21. Latent Prints Examiner Ashlee Taylor, FBI
22. Latent Prints Examiner Elaina Graff, FBI
23. Latent Prints Examiner Erik Carpenter, FBI
24. Latent Prints Examiner Jacqueline Slebrch, FBI
25. Latent Prints Examiner Nicole Bagley, FBI
26. Linguist Diana Doss, FBI
27. Linguist Moon Kim, FBI
28. Linguist Ping Cross, FBI
29. Special Agent Elisabeth Wheeler, FBI
30. Special Agent Elliot Lamarre, FBI
31. Special Agent Kelsey Palermo, FBI
32. Special Agent Sean McCarthy, FBI
33. Supervisory Special Agent Geoffrey Stankevitz, FBI
34. Kevin Hecht, ret. Special Agent FBI
35. Robert Reilly, ret. Special Agent FBI
36. Task Force Officer Ian Rosenberg, FBI
37. Special Agent Mark Cosentino, Homeland Security Investigations (“HSI”)
38. Special Agent Neviene Habeeb, HSI
39. Special Agent Thomas Mulhall, HSI
40. Special Agent Christopher Miller, Drug Enforcement Administration (“DEA”)
41. Special Agent Matthew Maguire, Diplomatic Security Service (“DSS”)
42. Intelligence Analyst Eungee Hwang, U.S. Attorney’s Office, Eastern District of New York

43. Special Agent Marcus Rivera, U.S. Attorney's Office, Eastern District of New York
44. Special Agent George Dietz, U.S. Attorney's Office, Eastern District of New York
45. John Ross, ret. Supervisory Special Agent, U.S. Attorney's Office, Eastern District of New York
46. [REDACTED]
47. [REDACTED]
48. [REDACTED]
49. [REDACTED]
50. [REDACTED]
51. [REDACTED]
52. [REDACTED]
53. [REDACTED]
54. [REDACTED]
55. [REDACTED]
56. Absolute Investigations LLC
57. Andrew Wedeman
58. Brian J. Neary
59. Brian O'Rourke
60. Chen Chaohong
61. Chen Hansheng
62. Gregory Finning
63. Eric Gallowitz
64. Hu Ji, also known as Eric Yan
65. J Lifetime LLC
66. Jin Hongru, also known as Allen Jin

67. Lance Ribacoff
68. Li Feng
69. Li Minjun
70. Li Qi
71. Liu Jing
72. Li Songqing
73. Li Hongzhong
74. Kuang Zebin, also known as Vincent Kuang
75. Mary McMahon, also known as Mary Martha McMahon or Martha Byrne
76. McMahon Investigative Group
77. Michael Kelly
78. Michael T. McMahon
79. North American Services
80. Rong Jing
81. Shi Laping, Esq.
82. Stuyvesant Investigative Group
83. Sun Hui
84. Tu Lan
85. Wang Shutao
86. Xiao Jun
87. Xinba Construction Group Co. Ltd.
88. Xu Guohua
89. Yu Haiping
90. Zhai Yongqiang

91. Zhu Feng, also known as Johnny Zhu
92. Zhu Haiping
93. Zhu Jianping

Places:

94. Hubei Province in the People's Republic of China
95. Warren, New Jersey
96. Short Hills, New Jersey
97. Transperfect Office located at 132-21 Roosevelt Avenue, Suite #210, Flushing, New York
98. Hotel Edison located at 228 W. 47th St., New York, New York
99. Panera Bread located at 770 NJ-17, Paramus, New Jersey
100. Embassy Suites located at 95 International Blvd, Elizabeth, New Jersey
101. Extended Stay Hotel located at 45 International Blvd, Elizabeth, New Jersey

The parties reserve the right to supplement or modify this list.